

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE WORLD TRADE CENTER
DISASTER SITE LITIGATION**

CHRISTOPHER RYAN, ET AL.,

Plaintiff(s),

- against -

A.RUSSO WRECKING, INC., ET AL.,

Defendant(s).

**PARTIAL STIPULATION OF
VOLUNTARY DISMISSAL WITH
PREJUDICE – DERIVATIVE CLAIM
ONLY**

21 MC 100 (AKH)

05-CV-1632

*motion granted:
the step is signed:
4/7/11
Alvin K. Hellerstein*

**UNOPPOSED MOTION FOR AN ORDER VOLUNTARILY
DISMISSING DERIVATIVE CLAIM**

PLEASE TAKE NOTICE that on a day to be determined by this Court, Plaintiffs'

Liaison Counsel, Worby Groner Edelman & Napoli Bern, LLP, counsel for the moving plaintiffs

Christopher and Erin Ryan, shall apply to the Honorable Alvin K. Hellerstein, U.S.D.J. at the

Southern District of New York located at 500 Pear Street, New York, New York, Room 14-D for

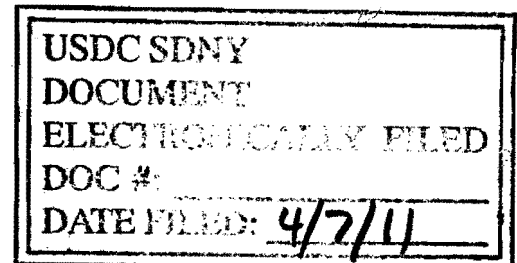
an Order seeking the voluntary dismissal of all derivative claims by plaintiff Erin Ryan pursuant

to Federal Rule of Civil Procedure 41(a)(1)(2).

PLEASE TAKE FURTHER NOTICE that Worby Groner Edelman & Napoli Bern,

LLP shall move this Court for any additional appropriate relief in which this Court deems just

and proper.



Dated: April 6, 2011

A handwritten signature in black ink, appearing to read 'Christopher R. LoPalo', written over a horizontal line.

Christopher R. LoPalo (CL-6466)
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